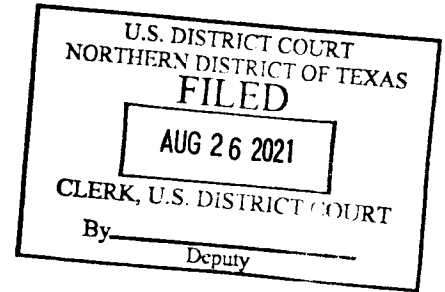


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

No. 4:21-MJ- 583

ANGEL AGUILAR MONTALVO

CRIMINAL COMPLAINT

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about January 10, 2019, **Angel Aguilar Montalvo**, the defendant, knowingly received child pornography using any means and facility of interstate and foreign commerce, including by computer.

Specifically, using a HP Laptop, model 15-CC057CL serial number 5CD7380KBH and the Internet, **Aguilar Montalvo** received the following child pornography, visually depicting prepubescent minors engaged in sexually explicit conduct:

File Name	File Description
565.jpg	This image depicts a prepubescent female lying down. The female is wearing a white t-shirt and has a white bow in her hair. A male is holding his erect penis inside the female's open mouth.
561.jpg	This image depicts a prepubescent female nude from the waist down. The female is wearing a gray and red striped shirt and has a white pacifier in her mouth. A pink sex toy has been inserted into the genitals of the female.

In violation of 18 U.S.C. §§ 2252A(a)(2) and (b)(1).

I further state I am a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations (HSI), and this complaint is based on the following facts gathered through an investigation I have conducted, my training and experience, and information provided to me by other law enforcement officers.

INTRODUCTION

1. I have been employed as a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations (HSI) since December 2003. I am a graduate of the Criminal Investigator Training Program and the U.S. Immigration and Customs Enforcement Special Agent Training Academy. As a result of my employment with HSI, my duties include, but are not limited to, the investigation and enforcement of Titles 8, 18, 19, 21 and 31 of the United States Code. I am an “investigative or law enforcement officer of the United States” within the meaning defined in 18 U.S.C. § 2510(7), in that I am an agent of the United States authorized by law to conduct investigations of, and make arrests for, federal offenses.

2. I am currently assigned to the HSI Dallas Field Office, Child Exploitation Group, where I investigate criminal violations relating to the sexual exploitation of children, including the illegal production, distribution, receipt and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2252 and 2252A. Based on my training and experience, I am aware that it is a violation of 18 U.S.C. §§ 2252A(a)(2) and (b)(1) for an individual to receive child pornography using any means or facility of interstate commerce, including by computer.

OVERVIEW OF INVESTIGATION

3. In April 2019, Homeland Security Investigations (HSI) New York Special Agents (SA) initiated an investigation targeting a dark net website which focused on selling / distributing child exploitative material (CEM) and child pornography, referred to herein as “Website A”¹. Website A is a dark web hidden service that advertises packs of child pornography images and videos sold for a fee. Examples include:

- a. “FIVEpackCP of 13 Videos * CP”
- b. “*6756 photos * naked children 9-15 years”
- c. “five-pack-cp_s3”
- d. “* 462 videos * CP”

4. Additionally, the message on the home page of Website A states: “This site contains a collection of immoral materials for acquaintance and satisfaction of sick fantasies. If you know what it is and against it, just leave the site.”

5. On April 11, 2019, HSI New York conducted an undercover purchase of “* 462 videos * CP” from Website A, which described the purchase as a “archive of 27.9 Gigabytes, a collection of immoral videos with children.”

6. HSI New York paid 0.02454573 in Bitcoin (approximately \$124.00) for the files. In the course of making the purchase, agents discovered that the site operator was using Coinbase Commerce as a payment processor, which is one known to cooperate

¹ The real name of Website A is known to law enforcement but is being disguised in order to protect the ongoing investigation.

with law enforcement and comply with federal regulations for customer reporting. After the purchase of the 462 videos, HSI New York downloaded and reviewed the contents, which all consisted of CEM and child pornography videos.

7. On July 9, 2019, HSI New York conducted an undercover purchase of “five-pack-cp_s3” from Website A, which described the purchase as “archive of 238 megabyte, a micro-collection of immoral videos with children.” After purchasing the file, HSI agents downloaded and reviewed the contents. The file contained 13 videos of child pornography, all of prepubescent female children with ages ranging from infants to approximately five years old. In all of the videos, prepubescent female children were performing oral sex and/or being forced to manually sexually stimulate an adult male’s erect penis.

8. On September 9, 2019, HSI New York conducted an undercover purchase of “1280x720hd_s4” from Website A, which described the purchase as a “archive of 7.83 gigabytes, a mini 1280x720HD collection of immoral videos with children.” After purchasing the file, HSI agents downloaded and reviewed the contents. The file contained numerous videos of child pornography.

9. On each of the purchases from Website A and after the undercover agent sent payment, the site administrator provided a password to “unlock” the downloaded child pornography videos.

10. During some of the above purchases, HSI New York agents conducted undercover email communications with the administrator of Website A. The

administrator stated the passwords for the pack of child pornography videos change, but the content of these videos does not. The administrator further stated they keep track of the passwords by changing the numbers listed on the end of pack name. For example, for the pack “five-pack-cp_s3” when the administrator of the Website A changes the password it will then be labeled “five-pack-cp_s4,” but the content of the pack will remain the same. I believe that this is done to avoid customers from being able to share / access the downloads without paying.

11. As described above, during the undercover purchases of child pornography videos agents learned that the site operator was using Coinbase Commerce as a payment processor. Coinbase Commerce is a non-custodial cryptocurrency solution for merchants selling digital goods. Coinbase never controls the user’s cryptocurrency or private keys, only storing the keys in an encrypted manner on the cloud. The keys are only decrypted locally on the user’s machine. Coinbase does provide infrastructure for receiving payments. Specifically, it provides the merchant with web links for each of their digital products. The merchant points customers to these links, which describe the product, take basic customer information, provide a unique Bitcoin address for payment, and tell the customer how much Bitcoin to send.

12. Agents subsequently sent an administrative summons to Coinbase requesting all transaction information for payments sent to the site administrator’s Coinbase Commerce account for Website A. Among other information, these records include the IP address of where the digital payment originated (buyer), a general

description of what hardware device was used to conduct the transaction (i.e. what type of phone, web browser, etc.), a name of what was purchased (assigned by the seller), date and time of the transaction, and a unique Transaction Hash ID.

13. According to summoned records from Coinbase Commerce and subsequent analysis of the Bitcoin blockchain, HSI New York agents learned on or about July 31, 2020, a user purchased a pack titled “vedeos-462_s23” from Website A for approximately \$124.04 in U.S. dollars. This transaction was assigned “Transaction Hash” number

“00a24f365d92811ac9347fcab2c1a93f4ac4685467eadc22c2ccc7d49630f01b,” which is a unique number that identifies the specific transaction and cannot be duplicated for other transactions. It can be similarly described as a fingerprint of the transaction.

Additionally, Coinbase records reflected the payment was conducted utilizing an IP address of “47.190.81.60,” which traced back to Frontier Communications. Agents then sent an administrative summons to Coinbase for identifying information related to the above Transaction Hash, including who sent the \$124.04. Coinbase stated the payment was sent from a registered account containing the following:

- a. Name: Angel Aguilar
- b. SSN: xxx-xx-2355
- c. Date of Birth: xx/xx/64
- d. Address: 2310 Balsam Drive #B210, Arlington Texas 76006
- e. ID: Texas Driver License #15302644
- f. Phone Number: 214-859-0025
- g. Email Address: angelaam85@yahoo.com

14. I have viewed the “vedeos-462_s13” pack which was purchased and downloaded by HSI New York agents. This pack contains the same content as “vedeos-462_s23”. The reason the numbers are different was explained in paragraph 10. Below are descriptions of three videos contained with the “vedeos-462_s13” pack:

File Name	File Description
kg_Kelly_10_yo	This video depicts a nude female approximately 8 to 10 years old. The female is lying on her back at the edge of a bed. A male is seen inserting his penis into the female’s mouth.
Brunette Blowjob	This video depicts a clothed female approximately 5 years old. The female is performing oral sex on a male penis.
hmmleabnd	This video depicts an approximate 5 to 7-year-old female lying on her back on a bed. The female is only wearing pink socks which go up past her knees. The female’s legs are restrained with a yellow rope. The camera is focusing on the genitals of the female. The video cuts to a male sitting on top of the female who is lying on her back. The female begins to masturbate the male’s penis before the male takes over the masturbation. The male ejaculates on the face of the female.

15. To activate a Coinbase account it is required to submit a photograph of an identification document. The identification document submitted for this account was a Texas Driver License for **Angel Aguilar Montalvo**.

16. Additional Coinbase records indicated **Aguilar Montalvo** purchased ten additional packs from Website A in addition to the pack titled “vedeos-462_s23”. These

purchases occurred from June 23, 2020 to July 24, 2020. As part of their investigation, agents with HSI New York have been able to purchase and download several “packs” from Website A. HSI New York agents were able to purchase and download several “packs” which contain the same content as the ones purchased by **Aguilar Montalvo**. I have reviewed these “packs” and they do contain images and videos which meet the federal definition of child pornography.

17. On February 23, 2021, HSI agents executed a federal search warrant at 2310 Balsam Drive #B210, Arlington, Texas 76006. During the execution of the search warrant, agents encountered **Aguilar Montalvo**. During a post-*Miranda* interview, **Aguilar Montalvo** admitted he would download child pornography and save it to his laptop computer. **Aguilar Montalvo** claimed most of his child pornography downloads came from a second website, referred to as “Website B” for the purposes of this complaint. **Aguilar Montalvo** stated he paid a monthly fee to Website B and could download as much as he wanted. **Aguilar Montalvo** stated he would download child pornography which contained girls as young as five years of age and possibly as young as babies. **Aguilar Montalvo** said some of the videos would include sexual contact and some were “pretty hardcore.” **Aguilar Montalvo** said, “I don’t see any harm done” and “I know it’s illegal.” **Aguilar Montalvo** admitted to making purchases from Website A using Bitcoin. **Aguilar Montalvo** claimed he discovered Website A after seeing a link on a video he downloaded from Website B.

18. A forensic analysis was conducted on several electronic devices seized pursuant to the search warrant. Thousands of images and videos of child pornography were discovered on **Aguilar Montalvo's** HP Laptop model 15-CC057CL serial number 5CD7380KBH, Apple iPhone and PNY flash drive.

19. Based on my training and experience in child exploitation investigations, I am aware downloading an image from Websites A and B, requires use of the Internet. The Internet and HP Laptop, model 15-CC057CL serial number 5CD7380KBH, are means and facilities of interstate and/or foreign commerce.

CONCLUSION

20. Based on the facts set forth in this affidavit, I respectfully submit there is probable to believe on or about January 10, 2019, **Angel Aguilar Montalvo** knowingly received child pornography using any means and facility of interstate and foreign commerce, including by computer, depicting prepubescent minors engaged in sexually explicit activity, in violation of 18 U.S.C. §§ 2252A(a)(2) and (b)(1).



Noel R. Jones, Special Agent
Homeland Security Investigations

Sworn to before me and subscribed in my presence this 26th day of August 2021, at 9:59 0 a.m./p.m. in Fort Worth, Texas.



JEFFREY L. CURETON
UNITED STATES MAGISTRATE JUDGE